

Appendix C

Shoreline Substantial Development Permit #SHR2023-00003
Taylor Shellfish – Oakland Bay Floating Oyster Farm
Aesthetic Analysis

I. Overview

This memorandum provides supplemental information regarding the aesthetic impacts associated with Taylor Shellfish’s proposal (“Proposal”) to install and operate a floating oyster farm in Oakland Bay under Shoreline Substantial Development Permit #SHR2023-00003. This memorandum addresses the proposal’s impacts under relevant regulations and policies in the Mason County Shoreline Master Program (“SMP”) and provides information requested by the Hearing Examiner at the conclusion of the August 16, 2023 hearing.

II. Shoreline Laws and Policies Addressing Aesthetic Review of Aquaculture

The SMP contains a section specifically focused on views and aesthetics (MCC 17.50.145), and aesthetics are further addressed within the SMP’s aquaculture section (MCC 17.50.210).

MCC 17.50.145 identifies the following policies for views and aesthetics:

- (1) This program seeks to minimize obstructions of the public's visual access to the water and shoreline from new shoreline developments while recognizing private property rights.
- (2) Shoreline use and development should not significantly detract from shoreline scenic and aesthetic qualities (as seen from land or from water) that are derived from natural or cultural features, such as estuaries, bluffs, beaches, vegetative cover and historic sites/structures.
- (3) Clearing, thinning, and/or limbing for limited view corridors should only be allowed where it does not adversely impact ecological, aesthetic values or slope stability.
- (4) Vegetation conservation should be preferred over the creation or maintenance of views from property on the shoreline to protect shoreline ecological functions and aesthetics.
- (5) The county should achieve aesthetic objectives by implementing regulations and criteria for site planning, maximum height, setbacks, siting of buildings and accessories, screening, vegetation conservation, architectural standards, sign control regulations, appropriate development siting and maintenance of natural vegetative buffers.
- (6) Where there is an irreconcilable conflict between water-dependent shoreline uses or physical public access and maintenance of views from adjacent properties, the water-dependent uses and physical public access shall have priority, unless there is a compelling reason to the contrary.

MCC 17.50.210 includes one policy (a.10) specific to aesthetics, stating: “Recognition should be given to the possible impacts that aquacultural activities might have on the aesthetic quality of the shoreline area.” And it includes the following regulations specific to aesthetics:

- (J) To the maximum extent practicable, floating aquaculture structures shall not substantially detract from the aesthetic qualities of the surrounding area, provided methods are allowed by federal and state regulations and follow best management practices.
- (L) Aquaculture development shall be designed and constructed with best management practices to minimize visual impacts and shall be maintained in a neat and orderly manner. Aquaculture facilities, except navigation aids, shall use colors and materials that blend into the surrounding environment where practicable.
- (M) Proposed aquacultural developments shall make adequate provisions to control nuisance factors such as excessive noise and odor and excessive lighting. Permits shall include allowance for work at night or on weekends but may require limits and conditions to reduce impacts, such as noise and lighting, to adjacent existing uses.

MCC 17.50.210(b)(1).

The policies and regulations in the SMP are consistent with the Shoreline Management Act, chapter 90.58 RCW (“SMA”), and its implementing guidelines. For example, WAC 173-26-221(4)(d)(iv) confirms that in the event of conflict, priority is given to water-dependent uses over maintenance of views from adjacent properties, stating as follows:

Shoreline master programs should implement the following standards:

- (iv) Adopt provisions, such as maximum height limits, setbacks, and view corridors, to minimize the impacts to existing views from public property or substantial numbers of residences. Where there is an irreconcilable conflict between water-dependent shoreline uses or physical public access and maintenance of views from adjacent properties, the water-dependent uses and physical public access shall have priority, unless there is a compelling reason to the contrary.

The SMA and its implementing guidelines identify aquaculture as a preferred, water-dependent use that is of statewide interest, can result in long-term benefits, and can protect the resources and ecology of the shoreline. RCP 90.58.020; WAC 173-26-241(3)(b)(i)(A).

Similar to MCC 17.50.210(b), the SMA does not significantly focus on protecting views of the shoreline from adjacent residences. The only section of the SMA that specifically protects residential views contains a general prohibition on constructing structures taller than 35 feet that will obstruct the view of a substantial number of residences. RCW 90.58.320. The Proposal creates no risk of violating this section as the farm’s oyster bags will protrude only a matter of inches above the water surface and will not obstruct any views.

With respect to aquaculture, the SMA guidelines broadly address considering impacts to the aesthetic qualities of the shoreline, of which residential views form only a part. WAC 173-26-241(3)(b)(i)(C). And the guidelines do not prohibit impacts to aesthetic qualities or require impacts to be minimal. Instead, they only caution against significantly impacting aesthetic

qualities. *Id.* (“Aquacultural facilities should be designed and located so as not to ... significantly impact the aesthetic qualities of the shoreline”).

Specific to the Aquatic shoreline environment (areas below the ordinary high-water mark), the SMA guidelines allow new overwater structures for water-dependent uses. WAC 173-26-211(5)(c)(ii)(A). Such structures are not required to avoid aesthetic impacts but rather are encouraged to “consider impacts to public views.” WAC 173-26-211(5)(c)(ii)(D).

The Growth Management Hearings Board (“GMHB”) and Shorelines Hearings Board (“SHB”) have both issued decisions affirming that the SMA gives preference to shellfish aquaculture as a water-dependent uses and that it is inappropriate to prohibit aquaculture on the basis of aesthetic concerns provided appropriate management practices are used to minimize impacts. For example, in *Taylor Shellfish Company, Inc. v. Pierce County and Ecology*, the GMHB reinforced that the utilization of shorelines for economically productive uses that are particularly dependent on shoreline location or use is given high priority under the SMA and its implementing regulations, and the SMA clearly decrees that statewide interests shall take precedence over local interests in shorelines of statewide significance. Final Decision and Order, Case No. 18-3-0013c (June 17, 2019), p. 20, as modified by Order on Reconsideration (August 7, 2019). The GMHB found that numerous Pierce County aquaculture regulations failed to comply with the SMA and SMA guidelines when they were not supported by scientific and technical information but rather were adopted in response to local opposition to shellfish farming and in an attempt to “balance” the preferences of local citizens (including aesthetics concerns) against the statewide interest in fostering aquaculture.

Similarly, in *John Marnin and Juyne Cook v. Mason County and Ecology*, SHB No. 07-021, Modified Findings of Fact, Conclusions of Law and Order (February 6, 2008), an aquaculture proponent challenged conditions placed on a shoreline permit for an oyster and clam operation in response to neighbor concerns that included aesthetics. Among other things, a condition of approval required the removal of polyvinyl fencing that was used in the operation to limit the migration of cultivated oysters from the property. The fencing did not harm normal beach development processes but did cause aesthetic impacts. The SHB determined that the prohibition on fencing on purely aesthetic grounds was unwarranted under the Mason County SMP,¹ and the permit condition should be modified to allow fencing provided it is dark in color, such as black or dark brown. *Marnin*, Conclusion of Law 17.

III. The Proposal Satisfies SMP Regulations Addressing Aesthetics

As reflected above, Mason County has not adopted the recommendations in the Washington State Department of Ecology Aquaculture Siting Study as regulations governing issuance of

¹ The Mason County SMP applicable at the time of this case pre-dates the more recent comprehensive update and periodic review, but it included regulations regarding similar in character to the current Mason County SMP. For example, the prior SMP provided as follows: “Aquaculture development shall be designed and constructed to harmonize as far as possible with the local shoreline environment and shall be maintained in a neat and orderly manner... Proposed aquaculture developments shall make adequate provisions to control nuisance factors such as excessive noise and odor and excessive lighting.” *Marnin*, Conclusion of Law 10.

permits for aquaculture in the SMP. In fact, the SMP does not even discuss the Aquaculture Siting Study. Additionally, the analytical scope of that study—which focuses on impacts to views from upland properties—is narrower than the SMP, which more broadly addresses how an aquaculture proposal aligns with the aesthetic qualities of the surrounding area. MCC 17.50.210(b)(1).

The specific regulations governing review of aquaculture applications are provided at MCC 17.50.210(b)(1), and aesthetic concerns are addressed at paragraphs (J), (L), and (M). The Proposal complies with these regulations.

Paragraph (L) requires aquaculture development to “be designed and constructed with best management practices to minimize visual impacts and shall be maintained in a neat and orderly manner.” It also requires facilities (except navigation aids) to “use colors and materials that blend into the surrounding environment where practicable.” The Proposal will comply with best management practices (“BMPs”) for floating aquaculture, including all conditions of the programmatic consultation for shellfish farming activities in Washington State. Hearing Exhibit 8 at 10-12; Hearing Exhibit 14. The farm will be constructed and maintained in a neat orderly manner, with rows of oyster bags secured at regular 30-foot intervals. The oyster bags will be composed of black, marine-grade plastic. Black gear can be produced with the most uniformity in color, best maintains its integrity in the marine environment, and has been recently acknowledged as effectively minimizing potential aesthetic impacts. *Marnin*, Conclusion of Law 17.

Paragraph (M) requires aquacultural developments to make adequate provisions to control nuisance factors such as excessive noise and odor and excessive lighting, and it further provides that permits “shall include allowance for work at night or on weekends but may require limits and conditions to reduce impacts, such as noise and lighting, to adjacent existing uses.” Taylor Shellfish will avoid unacceptable noise impacts by operating the Proposal in compliance with the County’s noise ordinance, Chapter 9.36 MCC, and it will regularly monitor the health of cultivated species to prevent die-offs and odor issues. Taylor Shellfish has multiple farms in Mason County and has extensive experience successfully meeting the noise ordinance standards. *See also* Appendix B of Taylor Shellfish’s August 30, 2023 response to comments, discussing noise associated with farming activities. Further, unlike intertidal shellfish farms, which require significant operations at night depending on the time of year, this project’s work hours will be focused during daylight hours. Taylor Shellfish has only requested the ability to perform work one hour before sunrise and after sunset during the portion of the year when there are relatively few daylight hours, along with response activities at night when there is a need. Taylor Shellfish would direct all lights during work operations in a downward direction. Navigational lighting would be installed per Coast Guard requirements, with each light limited to approximately 6 lumens.

Paragraph (J) states: “To the maximum extent practicable, floating aquaculture structures shall not substantially detract from the aesthetic qualities of the surrounding area, provided methods are allowed by federal and state regulations and follow best management practices.” As discussed above, this regulation focuses broadly on how an aquaculture Proposal aligns with the aesthetic qualities of the surrounding area rather than the extent to which it impacts views from

residential properties. Further, the regulation does not prohibit aesthetic impacts, nor does it even prohibit a project from substantially degrading aesthetic qualities. Rather, it requires projects to minimize substantially detracting from the aesthetic qualities of the surrounding area to the maximum extent practicable.

For reasons discussed below, the Proposal complies MCC 17.50.210(b)(1)(J) because it will not substantially detract from the aesthetic qualities of the surrounding area. And even if it did, Taylor Shellfish is minimizing such impacts to the maximum extent practicable.

1. The Aesthetic Qualities of the Surrounding Area Include a Mix of Uses, Including Aquaculture, Industrial, Forestry, and Residential.

The aesthetic qualities of the area surrounding the Proposal—Oakland Bay—is characterized by a mix of uses, including aquaculture, industrial, forestry, and residential. A state highway, Highway 3, runs along the entire west side of Oakland Bay, contributing the area’s aesthetic qualities and producing regular background noise.

Mason County characterized the aesthetic qualities of Oakland Bay in the Inventory and Characterization Report (“I&C Report”) that informed development of the County’s SMP. The I&C Report provides a description of existing conditions, including land use, and an evaluation of existing natural shoreline processes and functions. With respect to the “Hammersley Inlet and Oakland Bay” area, the report describes land use in the area as “a mix of residential and vacant lands and aquaculture operations” and observes that “Oakland Bay Reach 28 also has agriculture and forestry land uses” and that “SR Route 3 parallels the entire western shore of Oakland Bay.” I&C Report, Chapter 5.3.5, p. 5-92. The report notes that existing man-made structures (e.g., bridges, bulkheads, roads, dikes, and overwater structures like docks), along with modifications to the shoreline, occur along Hammersley Inlet and Oakland Bay and are part of the shoreline characterization. *Id.* at p. 5-93.

In contrast to other areas, the I&C Report does not identify any key management issues specific to aesthetics and/or views for the area. *Compare* with Chapter 4.1.9, p. 4-18 and 4-19 (identifying key management issues for Hood Canal, several of which address views and aesthetics, including but not limited to: protect remaining view corridors; and cumulative effects on environmental resources and views of additional residential docks and piers). The I&C Report does identify, however, “protection and improvement of water quality to support significant recreational and tribal shellfish harvest and commercial aquaculture” as one such issue. Chapter 5.3.9, p. 5-94. More broadly, the I&C Report recognizes shellfish aquaculture as an important use throughout the County. *E.g.*, Chapter 10.1.2, p. 10-4 (“Shellfish farming remains a very important industry in Mason County, and an annual celebration called Oyster-Fest, started in the 1980s takes place at the Mason County fairgrounds in Shelton each year.”). Throughout the report, and with regards to the Hammersley Inlet and Oakland Bay area, shellfish aquaculture is identified as a significant resource and important economic driver in Mason County. Chapter 5.3.5 at 5-92. Existing shellfish aquaculture activities within Oakland Bay include a 90-acre oyster and clam farm in Chapman Cove (Taylor Shellfish), a 38-acre oyster and clam farm in the Bayshore area north of the Proposal (Taylor Shellfish), a 140 acre oyster and clam farm in Head of Oakland Bay (Taylor Shellfish), a 6-acre oyster and clam farm in Maple Beach (Taylor

Shellfish) a mussel raft farm located to the north of the Proposal (Sound Shellfish), and a floating upweller nursery in the Oakland Bay marina (Taylor Shellfish). Oakland Bay also supports significant tribal harvest on 45 acres and more than 8 additional commercial growers who farm their owned or leased lands or maintain FLUPSYs at the Oakland Bay marina.

The Mason County Comprehensive Plan also characterizes use and development within and around Oakland Bay. It identifies Oakland Bay as containing one of the only large deposits of high-quality sand and gravel in the County, with the permitted Johns Prairie site. Comprehensive Plan, Land Use Element p. 35, Rural Element p. 27. This ongoing mining site is located a short distance northwest of the site of Taylor Shellfish’s floating oyster farm Proposal.

Collectively, the aesthetic qualities of the surrounding area are characterized by a variety of uses and developments, with a strong history and prioritization of shellfish farming. These qualities are captured in the images appended as Attachment A to this memorandum.

While there is residential development with Oakland Bay, it is relatively low-density, particularly with respect to potential suitable locations for floating oyster bag cultivation within Mason County. Appropriate locations for floating oyster cultivation are greatly limited due to siting considerations, including: water quality; nutrients; salinity; currents and wave conditions; navigational channels; and logistical constraints. Taylor Shellfish carefully considered suitable locations for a floating oyster farm throughout the County, and the current site within Oakland Bay was one of the few potentially-appropriate locations. As illustrated in Attachment B and as shown in the table below, the Oakland Bay location has fewer residents compared to most shoreline areas within Mason County and relative to other potential floating farm locations in North Bay, Belfair, and Totten Inlet with suitable farming characteristics.

Potential Project Location	Approximate Number of Residences within Vicinity
Oakland Bay	69
North Bay	107
Hood Canal	238
Totten Inlet	200

Based on the above, the aesthetic characteristics of the surrounding area, for purposes of MCC 17.50.210(b)(1)(J), include a wide variety of uses and developments, including aquaculture operations, residences, forests, timber operations, a gravel pit, port facilities, and Highway 3. These activities and structures are visible in various locations throughout Oakland Bay, including from representative upland properties, as shown in Attachment A.

2. The Proposal Will Not Substantially Detract from the Aesthetic Qualities of the Surrounding Area.

The Proposal will complement, and not substantially detract from, the aesthetic qualities of the surrounding area. Shellfish have been commercially farmed in Oakland Bay since the 1800s, and there are currently over 270 acres of shellfish production in the bay, in addition to significant acreage under tribal harvest. Existing shellfish farms include both intertidal and subtidal/floating cultivation, including mussel rafts and FLUPSYs. Mason County recognizes that Oakland Bay is

a strong and important area for shellfish aquaculture, and this activity is encouraged in the SMP. Beyond shellfish cultivation, the surrounding area is characterized by a wide variety of uses and developments, including a gravel mine, port facilities, forestry, timber production, low-density residential development, and a state highway.

Given the significant shellfish cultivation currently within Oakland Bay and the mix of other uses and development, floating aquaculture projects fit in well with the existing aesthetic characteristics of the area generally. Moreover, this Proposal will include several measures and practices to ensure that it complements, rather than detracts from, aesthetic qualities, including: use of uniform gear colors that have been recognized to minimize potential aesthetic impacts; neat and orderly layout of farming operations; and best management practices to reduce potential noise and lighting impacts; and frequent monitoring to help ensure that shellfish aquaculture gear remains secured and maintains its integrity. Finally, there are no major public viewing points such as parks in the immediate vicinity of the Proposal, and Highway 3 affords limited, passing views of the site of the Proposal to motorists.

Comments were submitted regarding impacts to views of Oakland Bay from nearby residential properties, with some commenters contending that the Proposal should not be approved because it does not follow all recommendations in the 1986 Aquaculture Siting Study. As discussed above, however, the analytical focus of MCC 17.50.210(b)(1)(J) is broader than impacts to views from residential or other upland properties. Rather, this regulation concerns whether the Proposal is substantially degrading the aesthetic qualities of the surrounding area. Additionally, Mason County chose not to adopt or incorporate the recommendations in the Aquaculture Siting Study as review criteria for aquaculture projects in the SMP.

To the extent that views from residences are considered, however, the Proposal will have a minor to moderate impact, and it is consistent with the minimization recommendations in the Siting Study. The Siting Study identifies two categories of recommendations: (1) alternative site selection; and (2) modification of siting and design. Siting Study p. 6. Notably, these measures are described separated by the function word “or,” and are therefore alternative methods for effectively minimizing aesthetic impacts from upland properties. *State v. Weed*, 91 Wn. App. 810, 813, 959 P.2d 1182 (1998) (courts presume “or” is used disjunctively to separate phrases unless there is clear intent to the contrary). This is particularly true with respect to the recommendation to site aquaculture facilities 1,500-2,000 feet from the shoreline. Siting Study p. 5 (stating at distances greater than this, “the visual presence of most facilities is reduced to a line near the horizon. At this distance, size and surface coverage doesn’t seem to affect visual impact”).

The Proposal meets multiple recommendations from each minimization category. With respect to the first category, as discussed above the Proposal is located in waters offshore of “[c]ulturally modified landscapes, particularly those with existing commercial/industrial maritime activity.” Siting Study at 6. The Proposal is also offshore rural or uninhabited shorelines. Residential development near the Proposal is low density, has a Rural zoning (predominantly, Rural Residential 5 acres), and many nearby properties are undeveloped. *Supra*; Mason County Development Areas Map; Attachment B. Further, the shorelines adjacent to the Project site are

primarily low-bank, with the grade floor of most houses at approximately 30 feet or less above the ordinary high water mark (“OHWM”).²

With respect to the second category, the Proposal meets the recommendation to be “[h]orizontal in profile.” Siting Study p. 6. The Proposal’s oyster bags will only protrude a matter of inches above the surface of the water, eliminating the potential for views to be blocked and significantly minimizing the overall aesthetic impact. The Proposal also meets the recommendation to be “[o]rdered and of limited variations in material and color.” *Id.* The Proposal’s oyster bags will have a uniform black color, which the SHB has recently recognized as an effective color for minimizing aesthetic impacts. *Marnin*, Conclusion of Law 17.

The Proposal will be located more than 1,500 feet away from the OHWM to the northwest of the project site.³ As shown in the rendering included at Figure 1 of Attachment C, views from this area include residential development on the opposite shore, and the Proposal’s impacts will be reduced due to the various siting and design measures employed for the Proposal.

The Proposal will be located over 1,300 feet from the OHWM to the southeast of the project site. Views from this area are mostly from low bank positions and include a mix of activities and development on the opposite shore, including residences, Highway 3, and the area occupied by the gravel mine. These factors, along with the other siting and design measures incorporated into the Proposal, reduce aesthetic impacts. Further, as can be seen by comparing Figures 2 and 3 of Attachment C, relocating the Proposal to a location 1,500 feet offshore would not appreciably reduce the Proposal’s aesthetic footprint.⁴

For reasons stated above, the Proposal will complement, not substantially detract from, the aesthetic qualities of the surrounding area. Even if it were determined to substantially detract from the areas aesthetic qualities, it would still comply with MCC 17.50.210(b)(1)(J) because it is reducing such impacts to the maximum extent practicable by: employing gear that has a horizontal profile; utilizing uniform colors that are neutral and previously approved by the SHB; having a neat and orderly layout; and incorporating maintenance and monitoring activities to ensure operations remain as minimal as practicable. Accordingly, the Proposal complies with MCC 17.50.210(b)(1)(J).

IV. Conclusion

The Proposal satisfies the standards in the SMP for appropriately addressing aesthetic impacts of aquaculture projects. The Proposal is sited in an area characterized by a wide variety of uses and

² Based on area surveys, photos, and coastal atlas information, of the estimated 69 residences within the viewshed of the Proposal, approximately 20 have ground floor elevations at roughly 30 feet above OHWM and the remaining are at lower elevations. Of these 20 residences, the majority are on the southeast shore.

³ The Siting Study references distances “offshore” with respect to the distance from sea level, and based on the text, renderings, and drawings in the Study, this most closely equates to the ordinary high water mark.

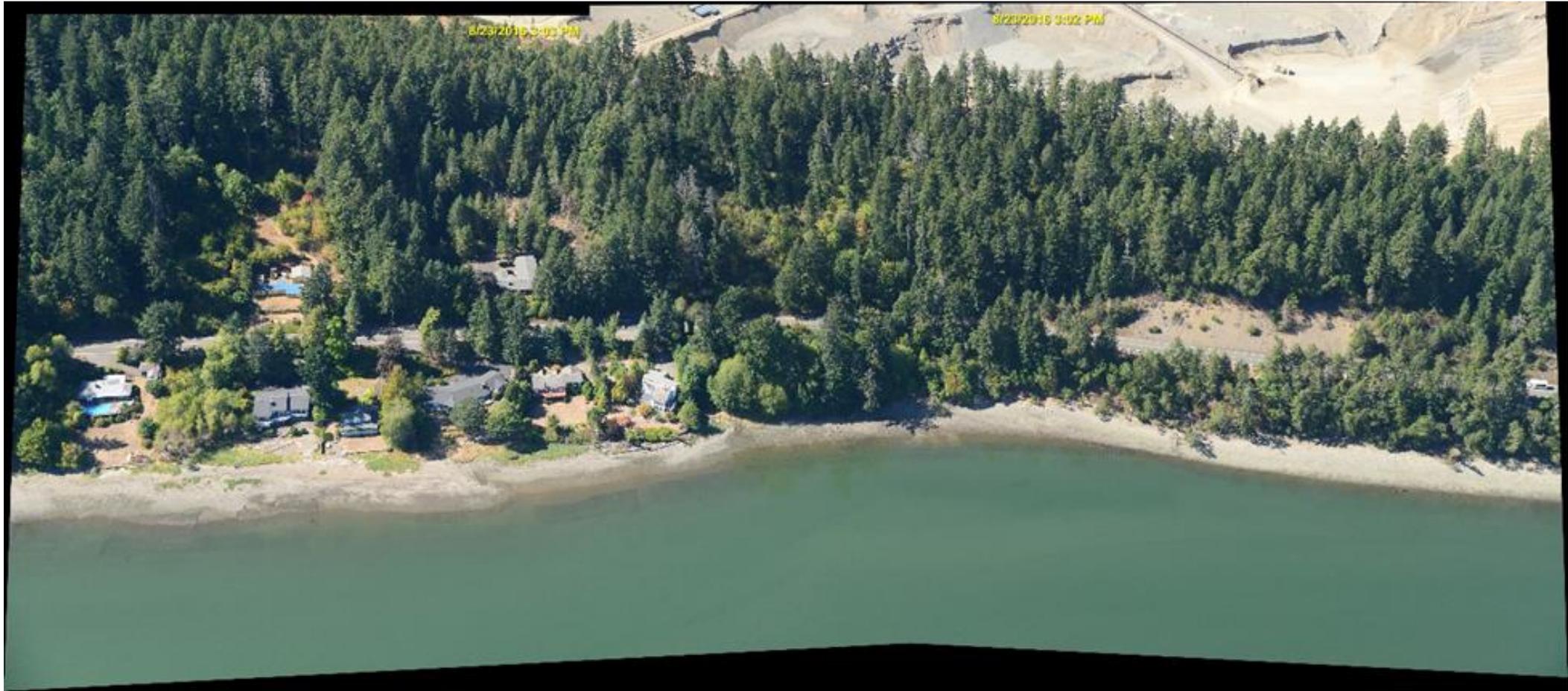
⁴ Figure 2 is a rendering showing the Proposal in its currently proposed location. Figure 3 is a rendering showing the Proposal located 1,500 feet offshore.

developments, including shellfish aquaculture, and it will complement the aesthetic qualities of the surrounding area. Further, Taylor Shellfish is employing all appropriate and practicable management measures to effectively reduce the Proposal's aesthetic footprint. Remaining objections on aesthetic grounds do not provide proper grounds for denying the Proposal under the SMP.

Attachment A



Google earth satellite imagery of Oakland Bay and surrounding features



North Shoreline homes, Hwy 3, Gravel Pit (photo taken from ECY Coastal Atlas)



North shoreline homes view from within proposed farm boundary.



South shoreline homes view from within proposed farm boundary.



Continuation of South shoreline from within proposed farm boundary. Chapman Cove on left side of frame.



View South from South farm corner



Sunset Rd shoreline looking towards Chapman Cove to the right. Existing near bottom oyster bag farm approximately 1,400' away (Blue arrow).



From Oakland Bay Marina looking North towards farm. Log rafts and boat 1,150' away (blue arrow).



From Taylor FLUPSY view towards farm. Gravel barge in line of sight. Obscured field of vision (trees) from road.



View from Taylor Bayshore Farm towards proposed farm. No safe vehicle pullout for scenic view of water between FLUPSY and Bayshore farm along Hwy 3



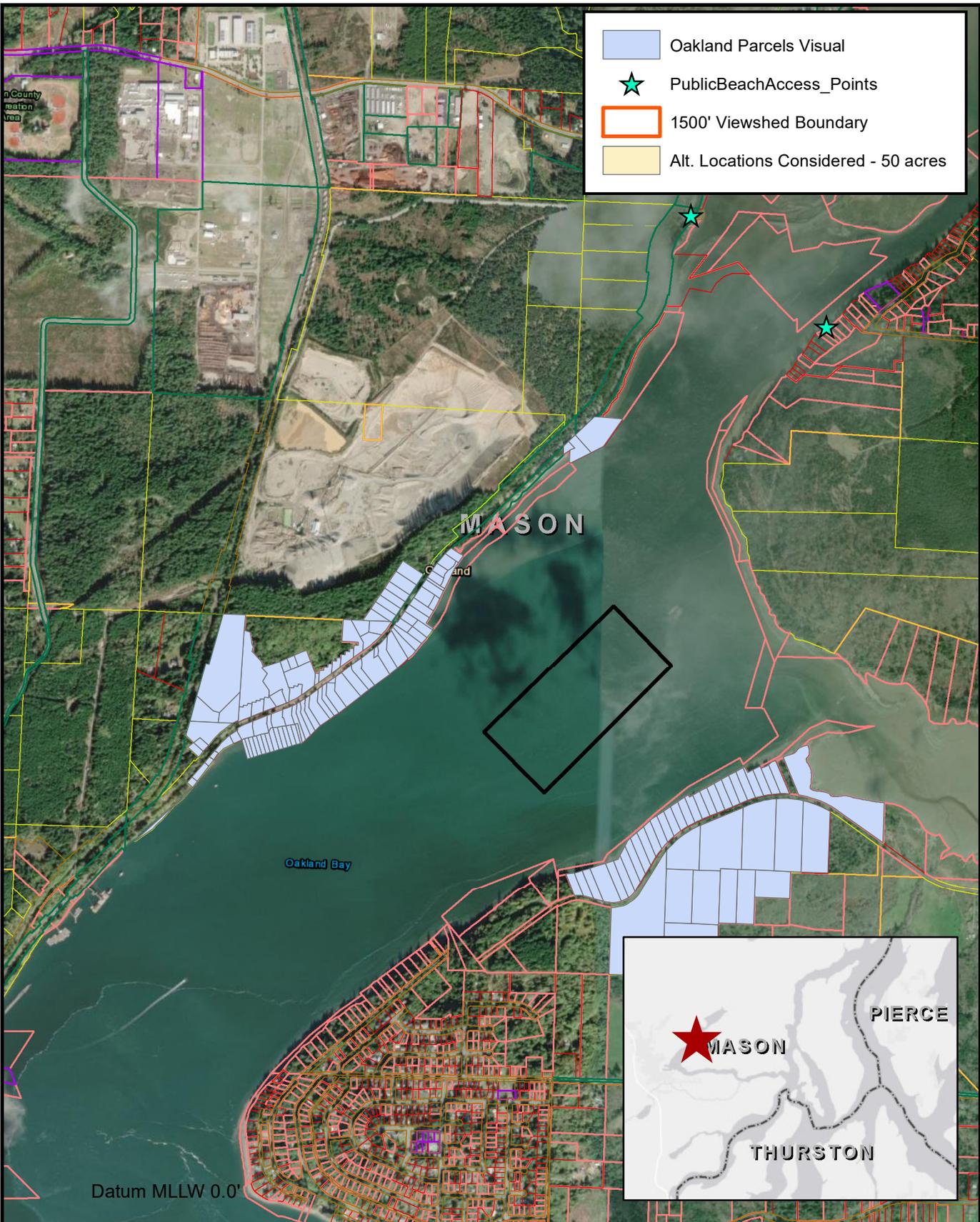
View towards proposed farm from Sunset Bluffs and Taylor tidelands.
No other public viewpoint to farm along Sunset Rd. View towards water obscured by trees and houses.



View from Sunset Rd towards existing farm in Chapman Cove.
Crew in boat working farm located approximately 1,600' from camera position.

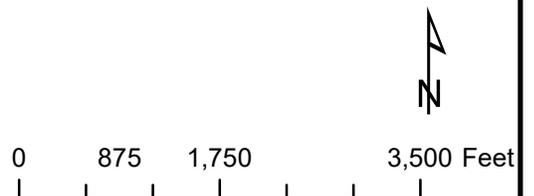
Attachment B

- Oakland Parcels Visual
- PublicBeachAccess_Points
- 1500' Viewshed Boundary
- Alt. Locations Considered - 50 acres

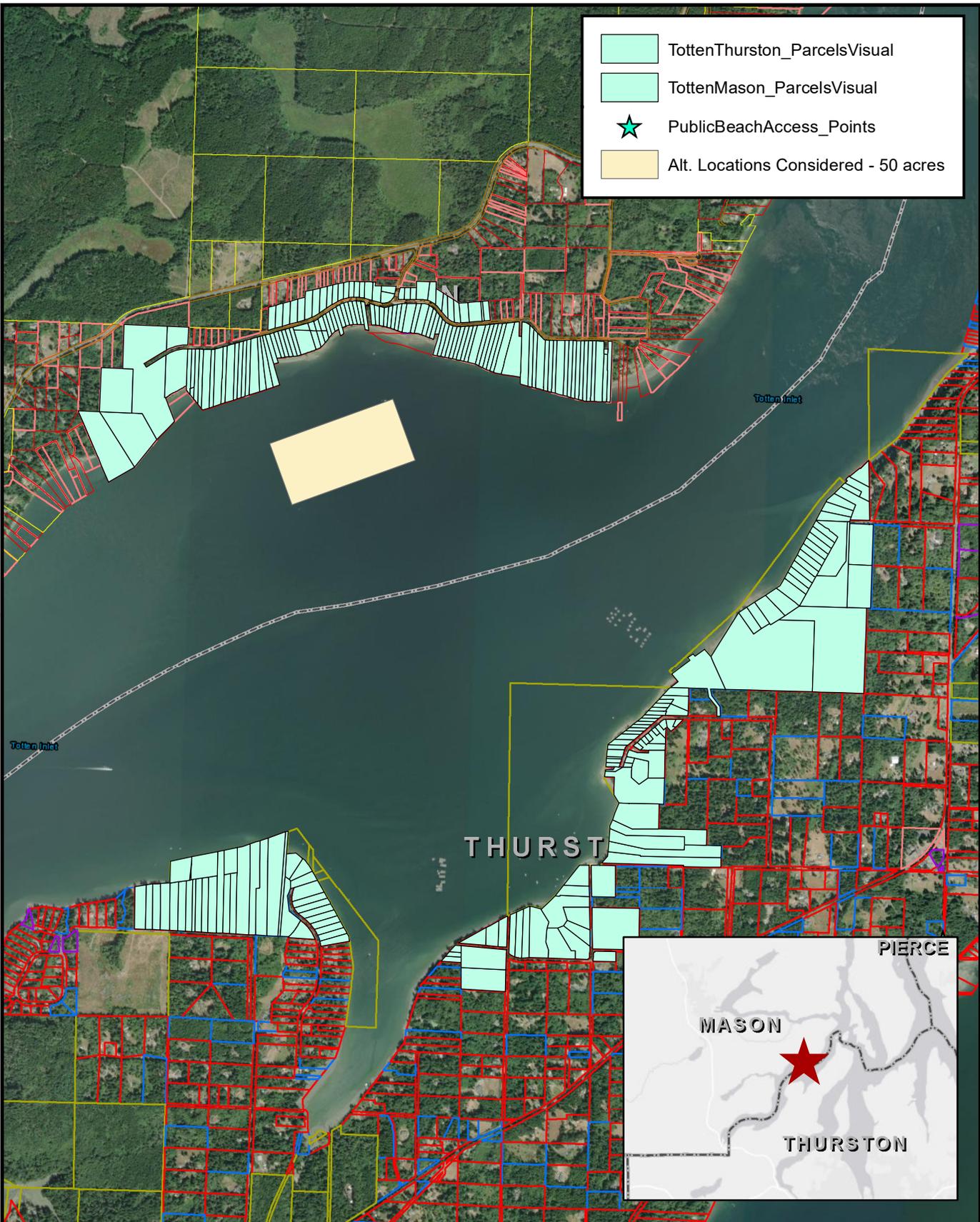


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Proposed Location: Oakland Bay, Mason County
 Visual: 133 Parcels, 69 Residences
 Recreation: Recreational shellfish, fishing
 Habitat: No eelgrass.
 Wildlife: Harbor Seals, Salmon

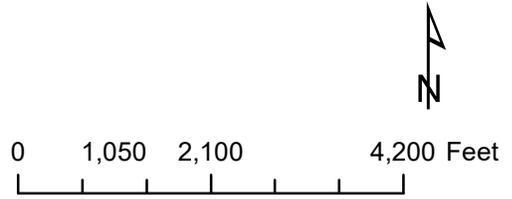


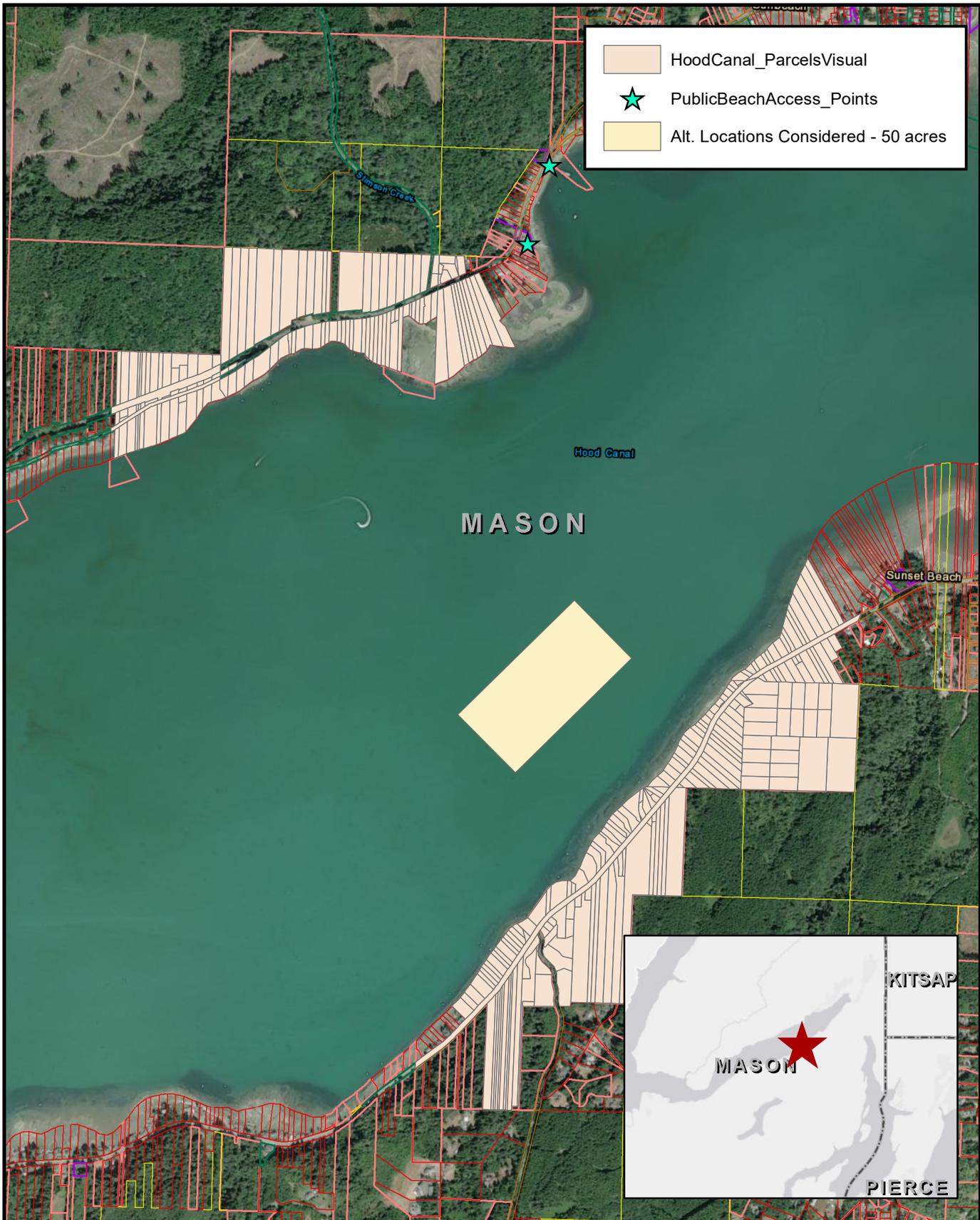
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- TottenMason_ParcelsVisual
- PublicBeachAccess_Points
- Alt. Locations Considered - 50 acres



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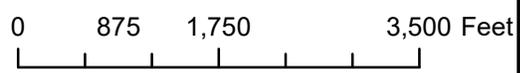
Alternative Location: Totten Inlet, Mason County
 Visual: 263 parcels, 200 Residences
 Recreation: Fishing/Shellfishing, High motorboat traffic
 Habitat: No known eelgrass
 Wildlife: Sea lions, Seals, Biggs Orca, Salmon, Forage Fish

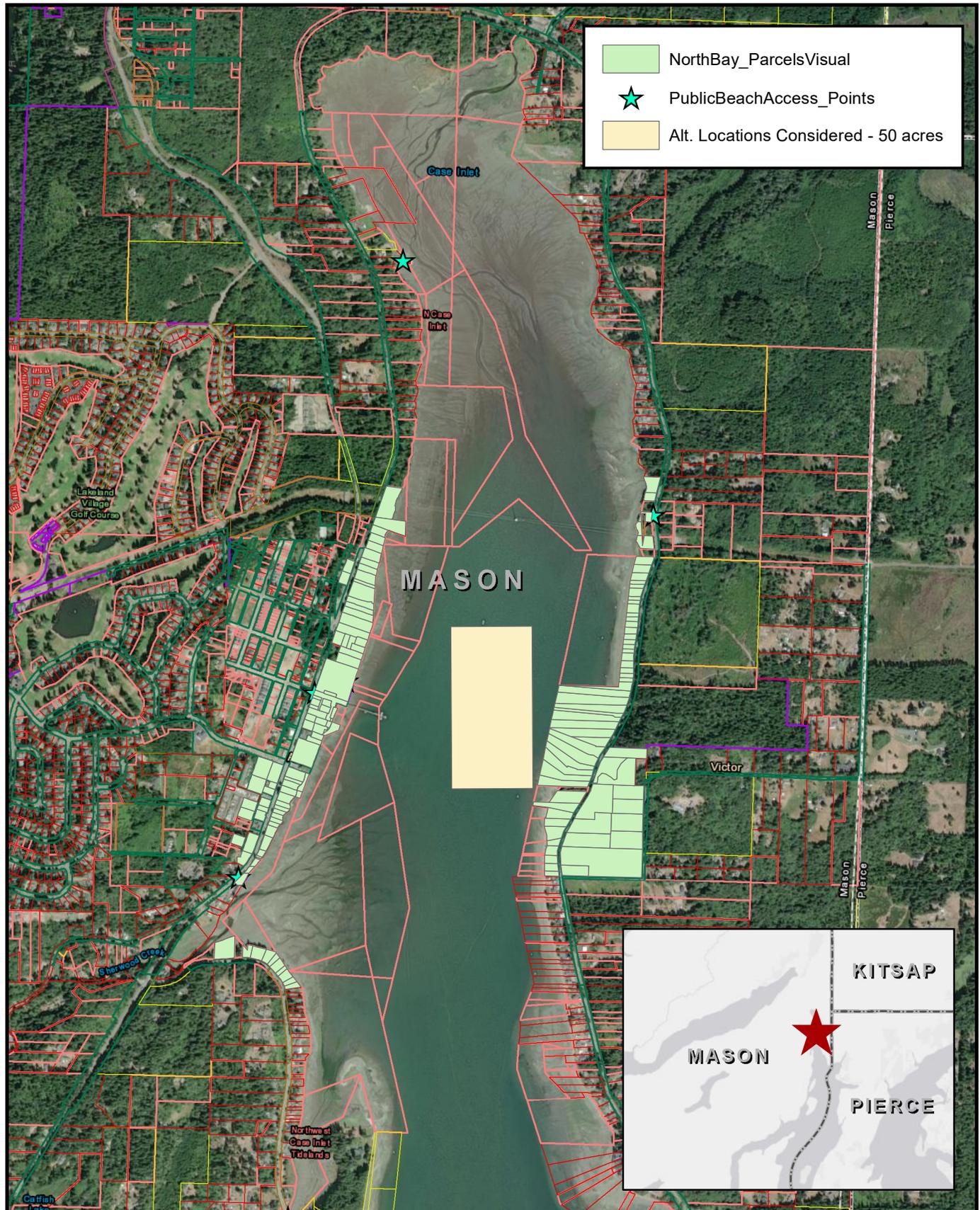




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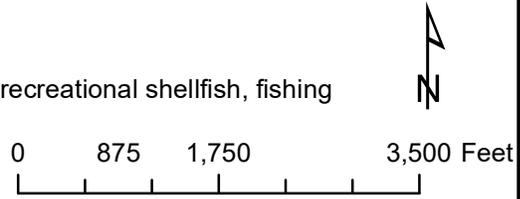
Alternative Location: Hood Canal, Mason County
 Visual: 321 Parcels, 238 Residential
 Recreation: Between Belfair and Twanoh SP, Fishing/Shellfishing, High motorboat traffic
 Habitat: Significant eelgrass on intertidal
 Wildlife: Sea lions, Seals, Biggs Orca, Salmon, Forage Fish





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Alternative Location: North Bay, Mason County
 Visual: 153 parcels. 107 Residences. 10 homes within 500' of boundary.
 Recreation: 2 Community parks w/ shoreline access, public launch, docks, recreational shellfish, fishing
 Habitat: Transient eelgrass on east shore
 Wildlife: Sea lions, Biggs Orca, Salmon



Attachment C



Figure 1: Rendering of Proposal from northwest shore of proposed site



Figure 2: Rendering of Proposal from southeast shore of proposed site



Figure 3: Rendering of Proposal relocated 1,500 feet away from southeast shore